

Introduction

The U.S. Environmental Protection Agency (USEPA) recognizes the major role of local government responders as the first line of defense for mitigating threats to public health and the environment from spills of oil and hazardous substances. In recognition of this role, EPA tries to provide local responders with the tools necessary to safely and effectively mitigate such incidents. Chemical countermeasures are one of those tools, but their use must be authorized and carefully managed. This information pamphlet describes that process where countermeasures are proposed for use on inland events such as fuel spills that may affect navigable waters. These include any surface waters and conduits to them, including road ditches and storm drains.

What are chemical countermeasures?

Any element, compound, or mixture that coagulates, disperses, dissolves, emulsifies, foams, neutralizes, precipitates, reduces, solubilizes, oxidizes, concentrates, congeals, entraps, fixes, makes the oil more rigid or viscous, reduces the harmful effects or otherwise helps remove the oil from the environment. This includes biological additives, dispersing agents, surface washing agents, surface collecting agents, burning agents and any other miscellaneous oil spill control agents.

Which ones can be used?

For spills that have the potential to reach navigable waters, either directly or by runoff, the chemical countermeasure must be listed on the Product Schedule found at Subpart J

of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

When can they be used?

Free product should first be recovered and/or removed to the extent practical.

Provisions must be made to contain and recover runoff from the treated area if there is a threat that it might reach navigable waters.

Approval is unlikely in situations where there are concerns with groundwater contamination (i.e., shallow aquifers, Karst geology) that might affect navigable waters.

Caution must be used when applying chemical countermeasures into a closed conduit, such as a sanitary sewer or storm sewer. Many countermeasures, particularly dispersants, break the fuel into small droplets and increase vaporization. In these cases, use only products specifically designed for vapor suppression.

When is approval necessary?

Product Schedule listing does NOT imply or confer pre-approval for use. It means only that the agent has met the performance testing requirements set forth in the NCP. Authorization is required for use in EVERY case where navigable waters may be affected. In cases where it is certain that no runoff can reach navigable waters, authorization is not required. An example of this might be treatment of a road surface to reduce slickness.

Who can give approval?

The NCP at Subpart J requires authorization from the On-Scene Coordinator (OSC), with concurrence from the Regional Response Team (RRT) and other affected agencies.

In cases where use of chemical countermeasures is necessary to prevent or substantially reduce an immediate hazard to human life, the OSC may authorize use of the agent without RRT concurrence for the emergency phase of the operation.

How do I request approval?

During a spill event, contact an OSC at the 24-hour EPA Region 6 Hotline number: 866.372.7745.

What information is needed to consider approval?

- Exact location of spill
- Type and amount of material spilled
- Justification for countermeasure use
- Potential health/environment impacts
- Name of countermeasure proposed
- Product MSDS
- Rate and method of application
- Estimated volume proposed
- Nearest surface water
- Forecasted weather conditions
- Monitoring strategy
- Material recovery strategy

Additional Information:

1. National Oil and Hazardous Substances Pollution Contingency Plan (NCP); 40 CFR Part 300 Subpart J:

http://www.epa.gov/oilspill/pdfs/900_920.pdf

2. NCP Product Schedule:

<http://www.epa.gov/oilspill/pdfs/schedule.pdf>

Or call 202.260.2342

3. NCP Product Schedule Notebook, with detailed information on listed products:

<http://www.epa.gov/oilspill/pdfs/notebook.pdf>

4. Product Schedule Q&A:

<http://www.epa.gov/oilspill/pdfs/ncpqna.pdf>

5. Oil Program Overview:

<http://www.epa.gov/oilspill/overview.htm>

24-Hour Numbers

USEPA Region 6
866.372.7745

National Response Center (NRC)
800.424.8802

Technical Information

214-665-7114
214-665-2785

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**United States
Environmental Protection
Agency
Region 6
Emergency Response and
Prevention Branch**



**Guidance
On the Use of
Chemical
Countermeasures
On Inland Oil Spills**

**Information for Local
Government Responders**